

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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Carol Knaak, Wanda Firchau,  
and Kay Oliver, et al.,

Court File No. 13-CV-00829 (JRT/AJB)

Plaintiffs,

v.

Armour-Eckrich Meats LLC,

Defendant.

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**JOINT MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT**

Plaintiffs Carol Knaak, Wanda Firchau and Kay Oliver, individually and on behalf of others similarly situated, by and through their attorneys, and Defendant Armour-Eckrich Meats LLC, (hereinafter “the Parties”), hereby move for:

1. Certification of a Rule 23 Class for settlement purposes;
2. Plaintiffs’ Counsel to be appointed as Class Counsel;
3. Named Plaintiff Carol Knaak to be appointed as Class Representative;
4. Plaintiffs’ Counsel to be appointed as Settlement Administrator;
5. A Class Notice and Claim Form to be approved for distribution; and
6. The scheduling of a final approval hearing.

This Motion is based the attached memorandum of law, the Affidavit of David E. Schlesinger, the Parties’ Settlement Agreement, the Proposed Class Notice, the Preliminary Allocation, and the Nichols Kaster Firm Resume. This Motion will also be

based upon the arguments of counsel should the Court wish to hold a hearing on Motion.

Dated: 6/16/14

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